

Exhibit N

MacInnis 8,284,844 Applied to Representative Panasonic and Toyota Accused Products

This claim chart compares independent claim 1 of U.S. Patent No. 8,284,844 (“the MacInnis ’844 patent”) to Panasonic’s MN2WS0210 system on a chip (“SoC”).

On information and belief, Panasonic’s MN2WS0210 SoC is representative of other Panasonic infotainment and high-end car information system SoCs having similar functionality (“Accused Panasonic Infotainment SoCs”).

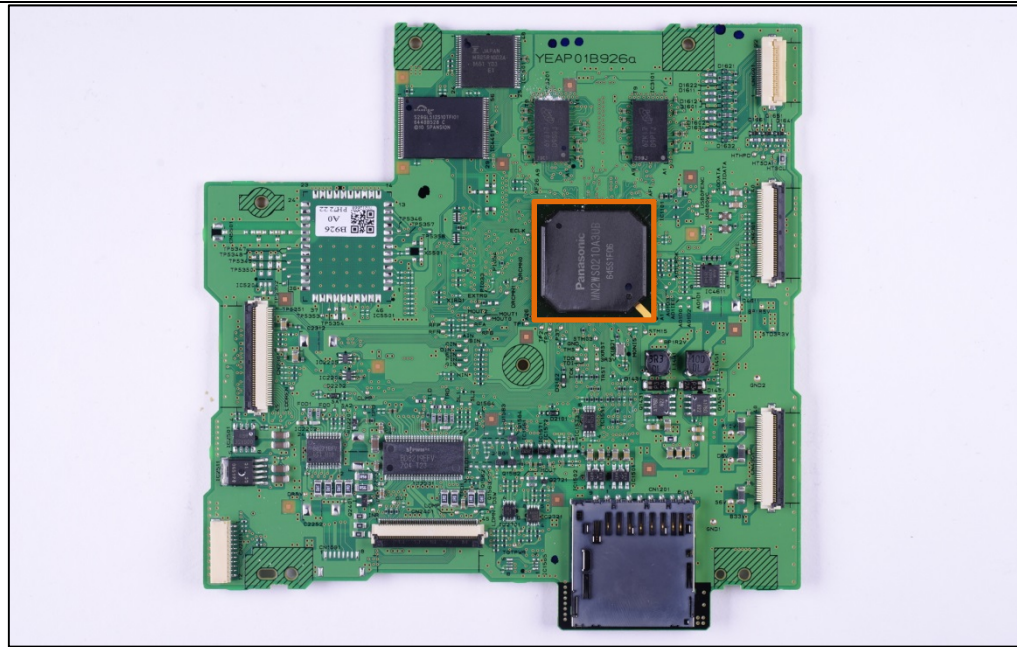
The MN2WS0210 SoC is incorporated in downstream products, including without limitation, Panasonic disc-player assemblies that form Accused Toyota Rear-Seat Infotainments units, including Toyota Sienna Disc Player assembly (86270-45030).

On information and belief the Accused Panasonic Infotainment SoCs, and head units and automobiles that incorporate the Accused Panasonic Infotainment SoCs infringe directly, indirectly, and or under the doctrine of equivalents, at least claim 1 of the MacInnis ’844 patent.

Claim - U.S. Patent No. 8,284,844 (MacInnis)	Application of Claim Language to Accused Product
Claim 1	
A digital media decoding system comprising:	<p>To the extent that the preamble is deemed limiting, the Panasonic MN2WS0210 SoC and downstream products include a digital media decoding system.</p> <p>At least the Panasonic (86270-45030) disc player, which is included in at least the Toyota Sienna Disc Player assembly (86270-45030), includes a Panasonic MN2WS0210 SoC (highlighted in orange).</p>







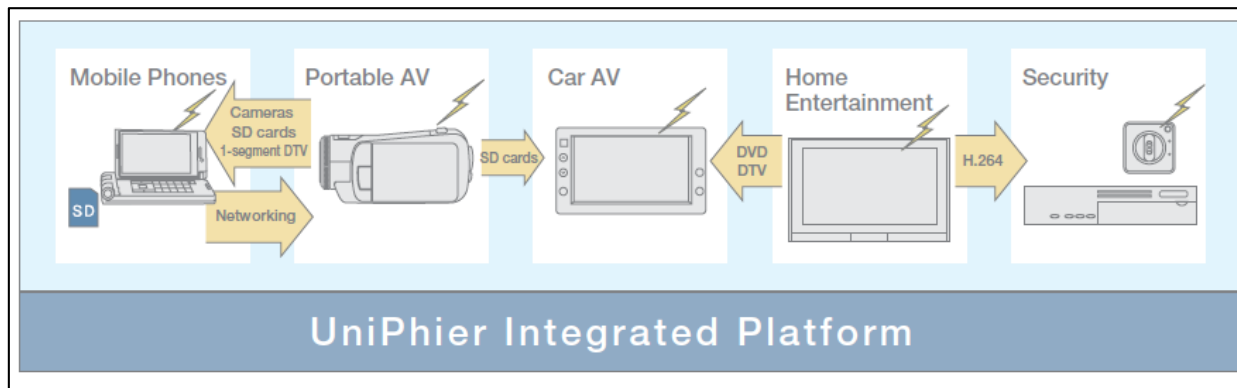
The MN2WS0210 SoC includes a digital media decoding system.

Upon information and belief, the MN2WS0210 SoC is a member of Panasonic's "UniPhier" family of SoCs. *See e.g.*, Ex. 70 – UniPhier Product Sheet at 2 (describing the UniPhier family of SoCs as being included in "Car AV" products).

The UniPhier brings together a range of Panasonic component technologies developed for mobile phones and portable, car, and home audio/video equipment.

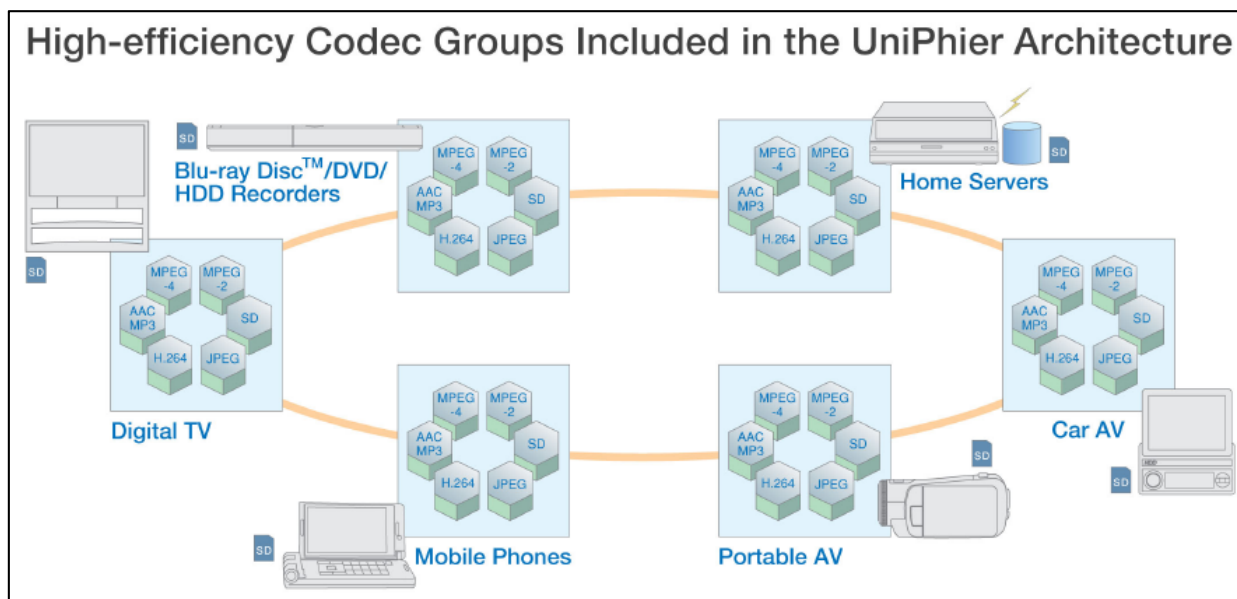
- (1) High-efficiency codec processing delivers high-quality audio and video.
- (2) Optimized power control at the system and semiconductor levels makes it possible to develop low-power LSIs.
- (3) Optimized distribution of audio/video processing and CPU-based application processing enables real-time audio and video processing.
- (4) Hardware- and software-based security forms the basis for a flexible, robust, and secure environment that is capable of protecting the integrity of media content and personal data.

Ex. 70 – UniPhier Product Sheet at 5.

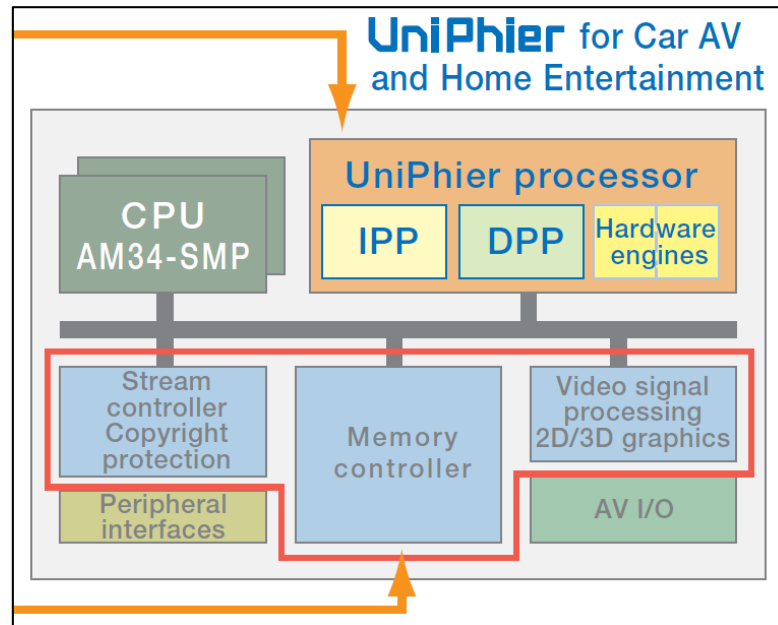


Ex. 70 – UniPhier Product Sheet at 2.

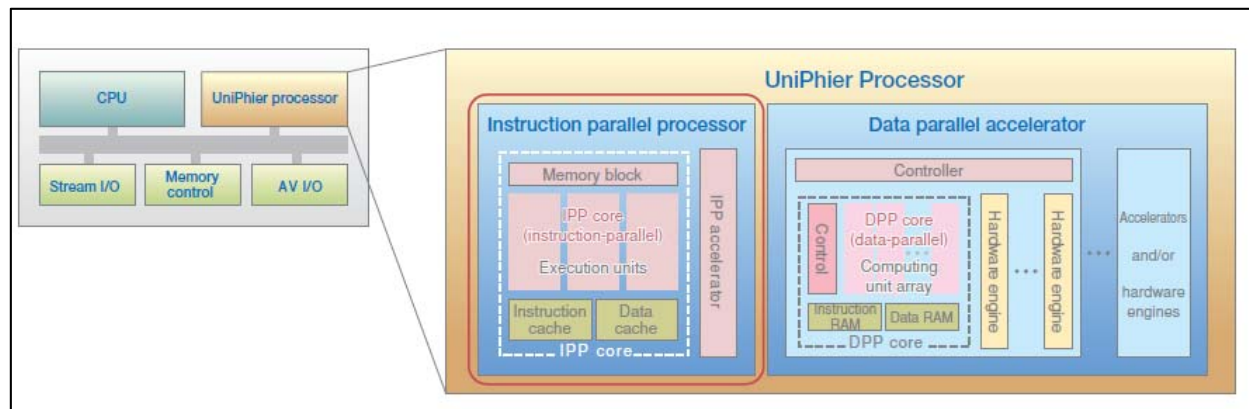
The Car AV UniPhier products, including the MN2WS0210, are capable of decoding several different video encoding standards, such as MPEG-2 and MPEG-4.



	Ex. 70 – UniPhier Product Sheet at 5.
a processor adapted to control a decoding process; and	<p>The MN2WS0210 SoC and downstream products include a processor adapted to control a decoding process.</p> <p>For example, the UniPhier family of SoCs includes “a CPU that provides overall system control,” which includes control of the video decoding process. The UniPhier family of SoCs also includes “a UniPhier processor that offers a standardized media processing architecture by using dedicated libraries to perform codec and other processing.”</p> <div data-bbox="567 519 1803 1029" data-label="Image"> <p>The image shows a screenshot of a document titled "UniPhier Integrated Platform Architecture". The title is in a blue header bar. Below the title, there is a paragraph of text describing the UniPhier integrated platform for digital appliances, mentioning hardware components like CPU, UniPhier processor, stream I/O block, and AV I/O block, and software components like device drivers, operating system, middleware, and media library. Below this paragraph is another paragraph highlighting the benefits of the UniPhier platform, such as high-quality audio/video technology, power-saving technologies, real-time capabilities, and secure architecture.</p> </div>
a hardware accelerator coupled to the processor and adapted to perform a decoding function on a digital media data stream,	<p>Ex. 70 – UniPhier Product Sheet at 3 (highlighted).</p> <p>The MN2WS0210 SoC and downstream products include a hardware accelerator coupled to the processor and adapted to perform a decoding function on a digital media data stream.</p> <div data-bbox="567 1183 1803 1370" data-label="Image"> <p>The image shows a screenshot of a document describing the UniPhier system LSI's hardware platform. It lists five components: a UniPhier processor core, Panasonic audio/video processing technologies, dedicated DSP solutions, a CPU, and stream I/O, memory control, and AV I/O blocks. It also mentions the processor's suitability for use in system LSIs optimized for specific product areas due to its combination of an instruction parallel processor (IPP) with support for C and C++ languages, exceptional computational performance, low power consumption, a data parallel processor (DPP), and an assortment of hardware engines and accelerators.</p> </div> <p>Ex. 70 – UniPhier Product Sheet at 4 (highlighted).</p>



Ex. 70 – UniPhier Product Sheet at 4.



Ex. 70 – UniPhier Product Sheet at 6.

	<p>The MN2WS0210 SoC decodes video that is computationally intensive. For example, Panasonic describes its Car AV UniPhier SoCs as providing “low-power” consumption while decoding “MPEG-4” and “H.264.” Ex. 70 – UniPhier Product Sheet at 5. These claimed capabilities suggest that Panasonic is “offloading” handling of at least some decoding functions from a CPU alone to a hardware accelerator. Ex. 75, Acton Decl. ¶ 13.</p> <p>Therefore, on information and belief, the MN2WS0210 SoC and downstream products comprise “a hardware accelerator coupled to the processor and adapted to perform a decoding function on a digital media data stream.” Ex. 75, Acton Decl. ¶ 13.</p>
wherein the accelerator is configurable to perform the decoding function according to a plurality of decoding methods.	<p>The MN2WS0210 SoC and downstream products include a hardware accelerator that is configurable to perform the decoding function according to a plurality of decoding methods.</p> <p>The UniPhier family of SoCs is capable of decoding multiple video compression standards. For example, the Car AV UniPhier SoCs are capable of decoding video compressed using at least the MPEG2, H.264, and MPEG4 standards. Ex. 70 – UniPhier Product Sheet at 5. Decoding MPEG2-compressed video requires performing several of the same decoding functions as MPEG4 requires. Ex. 75, Acton Decl. ¶ 14. Furthermore, decoding MPEG2-compressed video requires performing those functions according to a different method than MPEG4 requires. Ex. 75, Acton Decl. ¶ 14.</p> <p>Therefore, on information and belief, the MN2WS0210 SoC comprises a hardware accelerator that “is configurable to perform the decoding function according to a plurality of decoding methods.” Ex. 75, Acton Decl. ¶ 14.</p>